REMARKS

Applicants and Applicants' representative wish to thank Supervisory Patent Examiner Metjahic and Examiner Nguyen for the assistance extended during the personal interview held on June 10, 2003. In view of the discussion during the interview, the foregoing amendments, and the following remarks, reconsideration and allowance of the claims are respectfully requested.

Claims 1-21 are pending, with claims 1, 9, 14, 16, and 19 being independent.

Claims 4 and 14 stand rejected under 35 U.S.C. § 112, second paragraph, for being indefinite. Applicants respectfully traverse this rejection. The Office Action states that "the term 'offensive' is indefinite because it is a subjective value judgment that differs from one person to [the] next." Office Action, p. 2. Applicants request withdrawal and reconsideration of the rejection because the use of the term 'offensive' in claims 4 and 14 is definite as defined by examples provided in the specification for the term. Applicants explain on page 28 of the patent application that the term 'offensive' may be used as one example of a type of content classification criteria. Several examples are provided in the specification as to the type of content that may be considered 'offensive' such as, for example, web sites that include pornographic, violent, racist, or hate-related content. Thus, the term 'offensive' as used in claims 4 and 14 is definite as defined in the specification.

For at least these reasons, Applicants respectfully request the § 112 second paragraph rejection of claims 4 and 14.

Claims 1-6, 9, 12, and 14-21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tso (6,385,602) in view of Russell-Falla (6,266,664). This response first addresses the § 103(a) rejection of claims 1-6 and 16-18, then the § 103(a) rejection of claims 9, 12, and 19-21, and finally the § 103(a) rejection of claims 14 and 15.

Claims 1-6 and 16-18

Applicants respectfully traverse the § 103(a) rejection of claims 1-6 and 16-18. Claims 1 and 16 recite, *inter alia*, a method (claim 1) and a computer program (claim 16) for searching

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different data stores based on a classification of a search term that includes receiving at least one search term and <u>classifying the search term among at least first and second categories</u>. When the search term is classified within the first category, the search term is compared to first electronic information within a first electronic information store to determine whether matches exist. When the search term is classified within the second category, the search term is compared to at least second electronic information within at least a second electronic information store that differs from the first electronic information store to determine whether matches exist. A result is displayed based on the matches that are determined to exist.

Applicants request withdrawal and reconsideration of the rejections because Tso and Russell-Falla, either alone or in combination, fail to describe or suggest a method/program for performing a search, as generally required by these claims. More specifically, Tso and Russell-Falla also fail to disclose particular features of the search recited by the claims including classifying the search term among at least first and second categories.

Tso discloses a method for <u>presenting the results of a search</u>, but does not disclose aspects of actually <u>performing</u> a search. To present the search results, Tso examines search results and dynamically establishes one or more search result categories based upon attributes of the search results. Tso, col. 3, lines 52-56. As such, after a search has been concluded, categories are dynamically generated by Tso based upon common attributes among the various search results.

Stated differently, Tso relates to classifications of search results. However, Tso does not classify for purposes of performing a search or delivering appropriate search results. As a consequence, Tso fails to disclose classifying the search term, or performing a search of different data stores based on the results of the classification of the search term, each of which are recited by claims 1 and 16.

More specifically, as an apparent consequence of Tso's focus on the handling of search results, rather than on the performance of the search, Tso does not disclose receiving at least one search term, as recited in claims 1 and 16. The Office Action references step 104 of Fig. 1 in an attempt to establish that Tso discloses receiving at least one search term. However, step 104 of Fig. 1 discloses "receiv[ing] search <u>results</u>" (emphasis added), not a search <u>term</u>, as recited in claims 1 and 16.

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Also, as stated above, another apparent consequence of Tso's focus on the handling of search results, rather than on performance of a search, Tso fails to disclose classifying the search term among at least first and second categories.

Moreover, as an apparent consequence of Tso's focus on the handling of search results, rather than on performance of a search, Tso fails to disclose comparing the search term to first electronic information when the search term is classified within the first category and comparing the search term to second electronic information that differs from the first electronic information when the search term is classified within the second category, as recited in claims 1 and 16. As indicated previously, Tso does not disclose details regarding the performance of a search, and thus, fails to disclose performing a comparison of any search terms when the search term has been classified among different categories. Instead, after a search has been performed and results have been generated, Tso discloses using common attributes from the previously-obtained search results to determine and generate categories in which to place the results. Tso, col. 2, lines 53-67 and col. 3, lines 52-56.

Russell-Falla is generally similar to Tso in that it also fails to disclose or suggest aspects of performing a search. More specifically, Russell-Falla also fails to disclose or suggest classifying a search term among at least first and second categories, or comparing the classified search term against a selected electronic information store based on its classification. Thus, Russell-Falla fails to remedy the Tso shortcomings, and the combination therefore fails to render claims 1 and 16 obvious.

Instead, Russell-Falla discloses a method for determining whether or not to deliver content to a user who has requested Internet content by comparing the content of a requested web page to a pre-determined database of words or expressions. Based on the outcome of the comparison, the requested web page is either allowed to be displayed or blocked from being displayed.

Simply stated, Russell-Falla does not disclose or suggest, in general, searching different data stores based on a classification of a search term. More specifically, Russell-Falla fails to disclose or suggest receiving at least one search term and classifying the search term among at least first and second categories, or comparing the search term to first electronic information

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when the search term is classified within the first category and comparing the search term to at least second electronic information when the search term is classified within the second category.

For at least these reasons, Applicants respectfully request the withdrawal of the § 103(a) rejection of claims 1 and 16, and claims 2-6, 17, and 18 dependent therefrom.

Claims 9, 12, and 19-21

Applicants respectfully traverse the § 103(a) rejection of claims 9, 12, and 19-21. Applicants have amended claims 9 and 19 to clarify the claims for reasons not related to patentability.

As amended, claims 9 and 19 recite, *inter alia*, a method (claim 9) and a computer program (claim 19) for storing searchable and retrievable content into more than one distinct electronic information store that includes receiving searchable and retrievable content to be stored within more than one distinct electronic information store. The content is classified among a first electronic information store containing at least a first type of searchable and retrievable content and a second electronic information store containing at least a second type of searchable and retrievable content. The received searchable and retrievable content is stored based on the classifying among the first electronic information store and the second electronic information store such that different types of received searchable and retrievable content are stored among more than one distinct electronic information store. Applicants request withdrawal and reconsideration of the rejections because both Tso and Russell-Falla, either alone or in combination, fail to describe or suggest a method/program for storing received searchable and retrievable content in more than one distinct data store having different types of content based on the classification of the received searchable and retrievable content.

Tso discloses a method for <u>presenting</u> search results but does not disclose aspects of <u>storing</u> content in more than one distinct data store based on the classification of the content. Tso also does not disclose more than one distinct electronic information store containing different types of searchable content. To present the search results, Tso examines search results and dynamically establishes one or more search results categories based upon attributes of the search results. Tso, col. 3, lines 52-56. Necessarily, Tso examines results of searches in this process. Tso does not examine content <u>to be searched</u>. This distinction is significant because

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claims 9 and 19 recite a method and computer program for storing searchable and retrievable content.

To support the rejection of claims 9 and 19, the Office Action references Tso, col. 10, lines 50-58, in support of the position that Tso discloses storing the content based on the classifying among the first electronic information store and the second electronic information store. Applicants respectfully disagree because the section referenced in the Office Action merely describes a block diagram of a generic computer system.

> Computer system 400 also includes a main memory 406, such as a random access memory (RAM) or other dynamic storage device, coupled to bus 402 for storing information and instructions to be executed by processor 404. Main memory 406 also may be used for storing temporary variables or other intermediate information during execution of instructions to be executed by processor 404. Computer system 400 further includes a read only memory (ROM) 408 or other static storage device coupled to bus 402 for storing static information and instructions for processor 404. A storage device 410, such as a magnetic disk or optical disk, is provided and coupled to bus 402 for storing information and instructions.

Tso, col. 10, lines 48-60. The section referenced in the Office Action simply does not disclose storing searchable and retrievable content. Moreover, that section does not disclose storing content in more than one distinct data store based on the classification of the content.

Russell-Falla fails to cure the above-discussed Tso shortcomings, either alone or in combination, and notably, is not relied upon in the Office Action to support a showing of storing content in more than one distinct data store based on the classification of the content.

For at least these reasons, Applicants respectfully request the withdrawal of the § 103(a) rejection of claims 9 and 19, and claims 12, 20, and 21 dependent therefrom.

Claims 14 and 15

Applicants respectfully traverse the § 103(a) rejection of claims 14 and 15. Applicants have amended claim 14 to clarify the claim for reasons not related to patentability.

As amended, claim 14 recites a system for storing searchable and retrievable content that includes a first electronic information store having at least a first type of searchable and retrievable content that includes searchable content that has been classified as non-offensive and

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a second electronic information store having at least a second type of searchable and retrievable content that includes searchable and retrievable content that has been classified as offensive. The first electronic information store is at least logically distinct from the second electronic information store to enable controls over access to the searchable and retrievable content included within the first electronic information store and the second electronic information store. Applicants request withdrawal and reconsideration of the rejection because both Tso and Russell-Falla, either alone or in combination, fail to describe or suggest a first information store having searchable and retrievable content that has been classified as non-offensive and a second information store having searchable and retrievable content that has been classified as offensive content, where the electronic information stores are at least logically distinct from one another to enable controls over access to the searchable and retrievable content contained within the electronic information stores.

Tso discloses a method for presenting search results, which involves examining search results and dynamically establishing one or more search results categories based upon attributes of the search results. Tso, col. 3, lines 52-56. However, as discussed above, Tso does not disclose aspects of storing content in more than one distinct data store based on the classification of the content.

The Office Action references Tso, 410 of Fig. 4 and the corresponding text to support the position that Tso discloses a first electronic information store having content that has been classified as non-offensive. However, the text describing reference number 410 of Fig. 4 merely describes a generic storage device that is part of a block diagram description of a generic computer; that Fig. 4 and the corresponding description do not disclose a system for storing searchable content that includes a first electronic information store having searchable content that has been classified as non-offensive and a second electronic information store having searchable content that has been classified as offensive, where the electronic information stores are at least logically distinct to enable controls over access to the searchable content contained within the electronic information stores as recited in claim 14.

Specifically, reference number 410 of Fig. 4 is described several places in the Tso disclosure. For example, col. 10, line 58-60 indicates that a "storage device 410, such as a magnetic disk or optical disk, is provided and coupled to bus 402 for storing information and

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instructions." And, other references to reference number 410 of Fig. 4 further describe that instructions may be provided to the main memory of the computer from the storage device and that the storage device is an example of non-volatile media. Tso, col. 11, lines 13-15; col. 11, lines 30-32; and col. 11, lines 60-62.

The corresponding text simply does not describe a first electronic information store having searchable and retrievable content that has been classified as non-offensive, as alleged by the Office Action.

Russell-Falla fails to cure the Tso shortcomings, either alone or in combination. Russell-Falla does not disclose or suggest a first electronic information store having searchable and retrievable content that has been classified as non-offensive and a second electronic information store having searchable and retrievable content that has been classified as offensive. Instead, Russell-Falla discloses that the content of requested web pages is compared to a database of words or expressions that have been previously associated with potentially offensive or harmful web pages. Russell-Falla, col. 2, line 63 to col. 3, line 8. Furthermore, Russell-Falla does not disclose or suggest the combination of two distinct searchable information stores having different types of searchable and retrievable content, namely a first information store having non-offensive content and a second information store having offensive content to enable controls over access to the distinct searchable and retrievable content.

For at least these reasons, Applicants respectfully request the withdrawal of the § 103(a) rejection of claim 14, and claim 15 dependent therefrom. Moreover, with respect to claim 15, Applicants respectfully point out that the Office Action makes reference to Belfiore, which is not one of the § 103(a) references used to reject claim 15. Office Action, page 7. For this additional reason, Applicants respectfully request the withdrawal of the § 103(a) rejection of claim 15.

Claims 7, 8, 10, 11, and 13

Claims 7, 8, 10, 11, and 13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tso in view of Belfiore (6,038,610). Claims 7, 8, 10, 11, and 13 depend from independent claims 1 and 9. For at least the reasons discussed above with respect to claims 1 and 9, Tso fails to describe or suggest the features of claims 1 and 9. Belfiore fails to remedy the Tso shortcomings. Thus, the combination of Tso and Belfiore fails to describe or suggest the claims

1 and 9 features, or the features of claims 7, 8, 10, 11, and 13 dependent therefrom. Moreover, in view of the respective dependence upon claims 1 and 9, Applicants respectfully request withdrawal of the § 103(a) rejection of claims 7, 8, 10, 11, and 13.